

**National Pollutant Discharge Elimination System (NPDES)
2012 Construction General Permit
Stormwater Reconnaissance Inspection Report**

NPDES Tracking No: Unpermitted Facility

**Gobers, LLC
Septage Land Application Facility
Plummer, Idaho 83851**

**Inspection date: November 26, 2012
Report completion date: March 29, 2013**

Prepared by:

**Patrick Stoll, Environmental Scientist
U.S. Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit
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(208) 378-5772**

With assistance from:

**James Zokan, Environmental Protection Specialist
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I. Facility Information

Facility Name: Gobers Septage Land Application Facility

NPDES Tracking No.: Unpermitted

Facility Contact(s): Ben Johnson
Gobers, LLC
11215 E. Trent
Spokane Valley, WA 99206
509-924-5372

Project Type: NAICS # 562991

Facility Location: Highway 95 (1.65 miles north of Plummer)
Plummer, ID 83851

Mailing Address: Gobers, LLC
11215 E. Trent
Spokane Valley, WA 99206

Latitude/Longitude: 47.361039 / -116.886741

II. Inspection Information

Inspection Date(s): November 26, 2012

Inspector(s): Patrick Stoll, Inspector
EPA Region 10/OCE/IEMU/IOO
(208) 378-5772

Entry Time: 11:35 am pm PST
Exit Time: 12:55 pm PST

Weather Conditions: 34 (F), sunny

Receiving Waters: Unnamed tributary of North Fork Rock Creek

Purpose: A brief reconnaissance inspection to evaluate whether or not the facility should have applied for coverage under EPA's 2012 Construction General Permit

III. **Background Information**

This portion of report developed by James Zokan

Pat Stoll was going to Northern Idaho the end of November of 2012 to perform CWA Stormwater compliance inspections and I mentioned that the Tribes are always interested in EPA doing more inspection work on the reservations and areas surrounding the reservation affecting the Tribes resources. I made a call to a few Tribes and got in touch with Scott Fields the Water Resource Director for the Coeur d'Alene Tribe on November 20, 2012. I asked Mr. Fields if he had any concerns with projects that have an effect on local water resources due to not effectively addressing stormwater through Best Management Practices. Mr. Fields mentioned a project just a couple miles North of Plummer, Idaho on the East side of Hwy 95, that was associated with a company named Gobers LLC. The project was being developed was a septage land application facility. Mr. Fields said that the company started construction of the receiving /storage facility portion of the project in spring of 2012. I asked him if the area that was disturbed was over one acre. He said he was not sure, but believed it was. Mr. Fields emailed me the Preliminary Engineering Report and Site Approval letter that he was cc'd on from Idaho Department Environmental Quality (IDEQ) dated May 4, 2012.

After I got off the phone with Mr. Fields I let Pat Stoll know what Mr. Fields informed me about. I asked Mr. Stoll if he could look up on the EPA NOI database to see if an NOI for the project existed. Mr. Stoll was not able to find an NOI for the project. I reviewed the Preliminary Engineering Report from IDEQ. There was no reference to the installation of erosion and sediment controls or best management practices (BMPs) for managing stormwater. I did notice that it mentioned that plans and specifications for the septage receiving/storage facilities would need to be submitted to IDEQ for review and approval prior to starting construction. The IDEQ engineer that signed off on the letter was John C. Tindall. I contacted Mr. Tindall on November 20, 2012 and asked him about the project - specifically if he knew the size of the area that was disturbed by construction for the septage receiving/storage facilities. He said he was not sure, but thought it was at least 1 acre. I asked him if he had the engineer drawings that he could send me so I could calculate the area of the designed area for the receiving/storage facilities. I also asked Mr. Tindall when the construction of the receiving/storage facilities started and he thought sometime in June. I asked him if Gobers LLC had received a final approval in order for them to start construction and Mr. Tindall said that they started before a final approval was sent. He said it was just a formality and that IDEQ sent the approval letter later in the summer, but Gobers LLC had addressed the issues that IDEQ wanted them to address.

After I received the engineering designs I was able to use the scale of the drawings to roughly calculate the area of the receiving/storage facilities. I determined that the

designed area of the receiving/storage facilities was over 1.1 acres. Once I had the drawings I was also able to define the shape of the entire proposed project area and was able to locate the area on Google Earth. I was then able to determine that there was a creek within the project area adjacent to the receiving/storage facilities to the East/North East. I then looked at a USGS Topo Map via the internet based US Fish and Wildlife Wetlands Inventory interactive mapping system and determined that the creek was a tributary to the North Fork of Rock Creek.

I shared my findings with Mr. Stoll and he agreed to meet with Mr. Fields from the CDA Tribe and possibly visit the site. I called Mr. Fields and set up a meeting for the two to meet on November 26th, 2012.

IV. Site Visit

The remainder of this report was developed by Patrick Stoll

I met with Scott Fields, Program Manager with the Tribe's Lake Management Program in his office in Plummer, Idaho, on the morning of November 26, 2012. Mr. Fields provided me with a brief synopsis of the Gobers LLC (Gobers) operation and volunteered to show me where the site was located.

The Gobers land application facility is situated on the east side of Highway 95, a little over 1.5 miles north of Plummer, Idaho. I followed Mr. Fields to the Gobers site where I parked along the public right-of-way on the east side of the road. There was no activity at the site at the time of our arrival. As a representative of the Coeur d' Alene Tribe, Mr. Fields had a standing invitation from Gobers to visit the site at any time. I did not. Since I lacked permission to enter the site, I watched and took photographs from the right-of-way as Mr. Fields walked the perimeter of the disturbed area where septic trucks are unloaded and septage is temporarily stored prior to land application. As he walked the perimeter, Mr. Fields used a Garmin handheld GPS device to measure the site's perimeter and the total acreage of non-agricultural disturbed soil (soil that had been disturbed during the construction of the receiving and transfer operations a few months earlier). Mr. Fields measurements indicated that the area of disturbed soil was slightly over 54,000 square feet or roughly 1.25 acres in size (1 acre = 43,560 square feet). While Mr. Fields was conducting his measurements, I noted that Gobers had installed silt fencing at various locations around the site.

V. Area(s) of Concern

Part 1.1 (b) of the 2012 Construction General Permit requires permit coverage if "your project...will disturb 1 or more acres of land...". The measurements taken by Mr. Fields, measurements indicating that approximately 1.25 acres of soil were disturbed during construction of the septic transfer and storage facility, suggest that Gobers should have submitted a Notification of Intent for coverage under the 2012

Construction General Permit (CGP) before initiating construction at the site. It would also suggest that the facility was operating as an unpermitted site during the construction phase.


Report Completion Date:

Inspector:

Patrick Stoll, EPA/R10/IOO
Lead Inspector

Appendix A

Gobers Septage, Photo Log

Inspection site or facility name:	Gobers Septage Land Application Facility
Location:	Highway 95 (1.65 miles north Plummer) Plummer, Idaho 83851
NPDES ID #:	Unpermitted
Type of Inspection:	Stormwater Reconnaissance Inspection
Date of Inspection:	November 26, 2012
Inspector(s):	Patrick Stoll/U.S. EPA/R10/IEMU/IOO
Image capture device:	Richo Caplio 500SE
Media type and location where original/archived images are stored:	Digital photos supplied by various sources; compiled on Gobers Septage CD
Original file type, pixel dimensions, and file numbers assigned by camera:	JPG; 3264 x 2448 pixels; Image numbers R0011692through R0011710
Folder name for resized images and pixel dimensions (for use in Photo Log):	Gobers_LowRes; 800x 600 ppi
Photo Log Image ID #s:	Images numbered: 1-6
Digital images recorded by:	Patrick Stoll unless otherwise noted
Drainage/flow direction:	
Additional Notes:	Time stamp is off by 2 hours – did not reset for standard time or new time zone (PST vs MST)

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 1 (photo provided by John Tindal, IDEQ)
Transfer of septage from pumper truck to the 8000 gallon below-ground storage tank.



Photo No. 2 (photo provided by John Tindal, IDEQ)
Transfer of septage from pumper truck to the 8000 gallon below-ground storage tank.

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 3 (photo provided by John Tindal, IDEQ)
Transfer of septage from pumper truck to the 8000 gallon below-ground storage tank.



Photo No. 4 (R0011694)
Short entrance road from Highway 95 to Gobers' facility.

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 5 (R0011695)
Gated entrance at Gobers Land Application facility.



Photo No. 6 (R0011709)
Drainage ditch along the west side of the facility collects runoff from parts of the site and directs into culvert, under access road, and into continuation of the ditch into tributary of North Fork Rock Creek.

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 7 (photo by Scott Fields)
Backside of the transfer and storage facility.



Photo No. 8 (photo by Scott Feilds)
Another portion of the backside of the transfer and storage facility.

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 9 (R0011700)
Overview of the transfer and storage facility with drainage ditch in foreground.



Photo No. 10 (R0011704)
The south end of the transfer and storage facility as Scott Field walks the perimeter of the site to collect data for area calculations.

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 11 (R0011705)

The south end of the transfer and storage facility as Scott Field walks the perimeter of the site to collect data for area calculations.



Photo No. 12 (R0011706)

Scott Field complete his walk around the perimeter of the site to collect data for area calculations.

Gobers Septage Land Application
Plummer, Idaho; November 26, 2012



Photo No. 13 (R0011707)

Scott Field's perimeter data and calculations indicate that the area of soil disturbance during construction of the site exceeded 54,000 square feet (approximately 1.25 acres).

Appendix B



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

2110 Ironwood Parkway, Coeur d'Alene, ID 83814 (208) 769-1422

C. L. "Butch" Otter, Governor
Curt A. Fransen, Director

May 4, 2012

Ben Johnson
Gobers, LLC
11215 E. Trent
Spokane Valley, WA 99206
atrustedname@aol.com

Subject: **Gobers Septage Land Application Facility**, Preliminary Engineering Report and Site Approval

Dear Ben:

The Idaho Department of Environmental Quality (DEQ) has completed the review of the revised preliminary engineering report (PER) titled "Gobers, LLC, Agricultural Reclamation Project, April 12, 2012" prepared by Robert Tate, P.E., of Tate Engineering and submitted to DEQ on April 12, 2012 (P&S #11992). The PER discusses a proposed 150-acre domestic septage land application site located about 1.5 miles north of Plummer, Idaho on the east side of State Highway 95. Three (3) phases of site development are proposed starting with Phase 1 at a capacity of 20,000 gallons of septage per week and by Phase 3 capacity would be increased to 120,000 gallons per week.

On April 3, 2012, DEQ staff (John Tindall and Matt Plaisted) visited the proposed site with you and your consultant, Rob Tate. The purpose of the site visit was to determine if a successful agronomically-based operation could occur at the site. The site has been used for hay production and farm equipment can be driven on the rolling hills of the site.

The PER provides a management plan for the land application of septage from March until September incorporating the use of three (3) crops: spring wheat; winter wheat; and grass/hay crop. Sheet 6 of 10 in the PER shows a 50-foot buffer strip around the entire site and intermittent surface water streams where septage will not be applied. Also shown on Sheet 6, 20-foot vegetative buffer strips will be constructed along the contours of the fields to reduce the potential for run-off. The septage would be screened prior to land application. Page 9 of the PER, shows that there are no public wells within 0.25 miles of the proposed site and the closest domestic private well is 800 feet west of the proposed site.

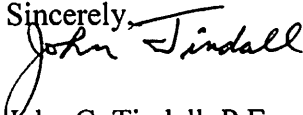
According the section of the Federal Regulations, 40CFR Part 503, detailing the land application of domestic septage and using nitrogen loading rates for the proposed crops recommended by the University of Idaho Agricultural Extension Service, about 54,000 gallons/acre/year of septage could be land applied on this site. That is equivalent to about 2 inches of septage per acre per year. The septage would be used to replace inorganic fertilizers to provide sufficient nitrogen for crop growth while not over-applying nitrogen that could negatively affect ground water quality.

Based on the site visit and review of the PER, the proposed site appears to be suitable for the land application of domestic septage. The following items will need to be addressed before the land application of domestic septage on the proposed site can occur:

1. **Concrete Transfer Pad Drainage** – A 60-foot by 28-foot, 8-inch thick, uncovered concrete pad is proposed to be constructed in Phase 1. Screened septage will be transferred from the delivery trucks to the 8,000 gallon storage tanker and from the storage tanker to the land application farm equipment on the concrete pad. A 6-inch high curb around the pad will provide a containment volume of about 9,000 gallons in case of a spill. The pad will be sloped to a center drain connected to a manhole. Precipitation on the uncovered pad will need to be treated as wastewater (2 feet of annual precipitation equates to about 25,000 gallons of water annually). Consideration should be given to including a valve between the manhole and drainage grate on the pad to prevent the manhole from overflowing (manhole volume is about 560 gallons). Please revise the applicable section of the report to discuss how the pad drainage system will function and be maintained. The calculations for the containment volume should also be provided with consideration for the vehicle access onto the pad. The PER is approved contingent on addressing this issue.
2. **Plans and Specifications for the Septage Receiving/Storage Facilities** – Plans and specifications for the septage receiving/storage facilities will need to be submitted to DEQ for review and approval prior to starting construction.
3. **Operation and Maintenance (O&M) Manual** – An O&M Manual will need to be submitted to DEQ for review and approval. The manual will focus on how through proper management of the site, domestic septage can be land applied while protecting surface water quality, ground water quality and public health. Approval of the site for the land application of septage would be contingent on compliance with the approved O&M Manual.

Please contact me at (208) 666-4629 if you have any questions.

Sincerely,



John C. Tindall, P.E.

John.tindall@deq.idaho.gov

c: Robert Tate, P.E., Tate Engineering, Coeur d'Alene rtate@tate-eng.com
Dick Martindale, PHD, Hayden dmartindale@phd1.idaho.gov
Scott Fields, Coeur d'Alene Tribe, Plummer sffields@cdatribe-nsn.gov
Matt Plaisted, P.E., DEQ, Coeur d'Alene matthew.plaisted@deq.idaho.gov
Gobers Septage Land Application PER. TRIM (P&S #11992)



